

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

**ALLTEL KENTUCKY, INC.'S and KENTUCKY ALLTEL, INC.'S RESPONSE TO
BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

ALLTEL Kentucky, Inc. and Kentucky ALLTEL, Inc., ("ALLTEL"), hereby submit this response to BellSouth Telecommunications, Inc.'s ("BellSouth"), First Set of Interrogatories in the above-styled proceeding.

RESPONSES TO INTERROGATORIES

1. Identify each switch owned by Company that Company uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

Response:

In accordance with the definition of "Qualifying Service" as referenced in Section 51.5 of Title 47 of the Code of Federal Regulations, ALLTEL Kentucky, Inc. and Kentucky ALLTEL do not provide qualifying services and as such questions pertaining to, or requesting information based on, qualifying services are not applicable to ALLTEL.

2. For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;

Response:

See ALLTEL’s response to Interrogatory Number 1.

- (b) provide the street address, including the city and state in which the switch is located;

Response:

See ALLTEL’s response to Interrogatory Number 1.

- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

Response:

See ALLTEL’s response to Interrogatory Number 1.

- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;

Response:

See ALLTEL’s response to Interrogatory Number 1.

- (e) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

Response:

See ALLTEL's response to Interrogatory Number 1.

3. Identify any other switch not previously identified in Interrogatory No. 1 that Company uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by Company either on an unbundled or resale basis.

Response:

See ALLTEL's response to Interrogatory Number 1.

4. For each switch identified in response to Interrogatory No. 3, please:
- (a) identify the person that owns the switch;
 - (b) provide the Common Language Location Identifier ("CLLI") code of the switch;
 - (c) provide the street address, including the city and state in which the switch is located;
 - (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
 - (f) identify all documents referring or relating to the rates, terms, and conditions of Company's use of the switch; and

- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

Response:

Not Applicable.

5. Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response:

See ALLTEL's response to Interrogatory Number 1.

6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

Response:

See ALLTEL's response to Interrogatory Number 1.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

See ALLTEL's response to Interrogatory Number 1.

- 8. Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

Response:

See ALLTEL's response to Interrogatory Number 1.

- 9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

Response:

Not Applicable.

- 10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

Not Applicable.

- 11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response:

See ALLTEL's response to Interrogatory Number 1.

- 12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

Response:

Not Applicable

- 13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

Not Applicable.

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:
- (a) Provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (b) Provide the street address, including the city and state in which the switch is located;
 - (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
 - (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts;
- and

- (f) Identify all documents referring or relating to the rates, terms, and conditions of Company's provision of switching capability.

Response:

None.

15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

Response:

ALLTEL has not conducted such a business case.

16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

Response:

ALLTEL has no documents other than the Company's Tariffs and Annual Reports on file with the Public Service Commission of the Commonwealth of Kentucky.

17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

Response:

See ALLTEL's response to Interrogatory Number 1.

18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Kentucky? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Kentucky.

Response:

Yes. See Exhibit B. All such ALLTEL switches are also identified in the Local Exchange Routing Guide (LERG).

19. Identify each MSA in Kentucky where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

See ALLTEL's response to Interrogatory Number 1.

20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

See ALLTEL's response to Interrogatory Number 1.

21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient

response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

Response:

Not Applicable.

22. Identify each MSA in Kentucky where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

See tariffs and maps on file with the Commission.

23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

See the Company Tariffs on file with the Commonwealth of Kentucky Public Service Commission.

24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area.

If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

Response:

See the Company Tariffs on file with the Commonwealth of Kentucky Public Service Commission, or on the internet at www.alltel.com.

25. Please state the total number of end users customers in the State of Kentucky to whom you only provide qualifying service.

Response:

See ALLTEL's response to Interrogatory Number 1.

26. For those end user customers to whom you only provide qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

Not Applicable.

27. For those end user customers to whom you only provide qualifying service in the State of Kentucky, please state the average number of lines that you provide each such end user customer.

Response:

Not Applicable.

28. Please state the total number of end users customers in the State of Kentucky to whom you only provide non-qualifying service.

Response:

COMPANY	Customer Count
Kentucky ALLTEL, Inc.	442,261
ALLTEL Kentucky, Inc.	24,587
Total	466,848

29. For those end user customers to whom you only provide non-qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

COMPANY	Billed Revenues	Cust Count	Avg Mo Rev
Kentucky ALLTEL, Inc.	\$25,608,630.19	442,261	\$57.90
ALLTEL Kentucky, Inc.	\$1,124,656.97	24,587	\$45.74
TOTAL	\$26,733,287.16	466,848	

30. Please state the total number of end users customers in the State of Kentucky to whom you provide both qualifying and non-qualifying service.

Response:

Not Applicable.

31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

Not Applicable.

32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Kentucky, please state the average number of lines that you provide each such end user customer.

Response:

Not Applicable.

33. Please provide a breakdown of the total number of end user customers served by Company in Kentucky by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

Response: ALLTEL tracks customers simply by Business and Residence classifications:

	Business	Residence
ALLTEL Kentucky, Inc.	2,975	21,612
Kentucky ALLTEL, Inc.	62,975	379,286

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Response: ALLTEL does not track acquisition costs for new ILEC customers.

35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Response: See EXHIBIT "A". ALLTEL did not begin collecting churn data by customer class until December 2002. ALLTEL measures churn data by access line and not customer. For EXHIBIT "A", Churn is defined as the number of business line disconnects in a given month divided by the total number of business access lines of the previous month. The churn calculation is the same for residence access lines.

36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

Response: ALLTEL does not know the share of the Local Exchange Market it has obtained.

37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Kentucky.

Response: See the response to Interrogatory No. 36.

38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Kentucky.

Response: See the response to Interrogatory No. 36.

39. Describe how the marketing organization that is responsible for marketing qualifying service in Kentucky is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Kentucky, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

Response:

See ALLTEL's response to Interrogatory Number 1.

40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

Response:

ALLTEL does not have a specific set of guidelines that are followed in making this determination as it will vary by situation.

41. Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

Response: Generally, if there are sufficient facilities and if the customer's requested service is not affected, then a decision to utilize a DS1 as opposed to a DS0 is cost effective for the customer when the customer requests 12 to 14 or more trunks.

42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, a digital PBX, or a digital Key System, be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, the PBX, or the Key System, or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

Response: Any equipment that de-multiplexes a DS1 to DS0 circuit would be suitable. The price would vary depending on the vendor, type and volume of circuits that require de-multiplexing. In the example given for 10 DS0s, the best method would be to provide a channel bank with an approximate average cost between \$4000 & \$6000.

43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

Response:

See ALLTEL's response to Interrogatory Number 1.

44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

Response:

See ALLTEL's response to Interrogatory Number 1.

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

Response:

See ALLTEL's response to Interrogatory Number 1.

46. Provide your definition of sales expense as that term is used in your business.

Response:

Sales - includes costs incurred in selling products and services. This may include the determination of customer needs, the development and presentation of customer proposals, sales order preparation and handling and the preparation of sales records.

47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

Response:

See ALLTEL's response to Interrogatory Number 1.

48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

Response:

See ALLTEL's response to Interrogatory Number 49.

49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

Response:

General and Administrative - includes costs in performing general and administrative activities not provided for in other accounts which may include but not limited to accounting and finance, external relations, human resources, information management, legal, procurement, research and development and other general and administrative costs.

50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for Company in each state in BellSouth's region.

Response:

Not Applicable.

51. For each individual hot cut identified in response to Interrogatory No. 50, state:
- i. Whether the hot cut was coordinated or not;
 - ii. If coordinated, whether the hot cut occurred as scheduled;
 - iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Company, the end-user customer, or some third

party, and describe with specificity the reason the hot cut did not occur as scheduled;

- iv. If there was a problem with the hot cut, state whether Company complained in writing to BellSouth or anyone else.

Response:

Not Applicable.

52. Does Company have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

Response:

No. ALLTEL has not identified a preferred process for performing batch hot cuts.

53. Does Company have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

Response:

See Response to Interrogatory Number 52.

54. If Company has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

Response:

See Response to Interrogatory Number 52.

55. If Company has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

Response:

See Response to Interrogatory Number 52.

56. Does Company have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response:

Not at this time.

57. Does Company have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response:

Not at this time.

58. What is the largest number of individual hot cuts that Company has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the

outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

Response:

Not Applicable.

59. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response:

ALLTEL does not have an opinion on this issue at this time.

60. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

ALLTEL does not have an opinion on this issue at this time.

61. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response:

ALLTEL does not have an opinion on this issue at this time.

62. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

ALLTEL does not have an opinion on this issue at this time.

63. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response:

ALLTEL does not have an opinion on this issue at this time.

64. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

ALLTEL does not have an opinion on this issue at this time.

65. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response:

ALLTEL does not have an opinion on this issue at this time.

66. Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

ALLTEL does not have an opinion on this issue at this time.

67. Does Company order coordinated or non-coordinated hot cuts?

Response:

No.

68. Does Company use the CFA database?

Response:

ALLTEL is not familiar with the term CFA database.

69. Identify every issue related to BellSouth's hot cut process raised by Company since October 2001.

Response:

None.

70. What is the appropriate volume of loops that you contend the Kentucky Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL does not have an opinion on this issue at this time.

71. What is the appropriate process that you contend the Kentucky Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL does not have an opinion on this issue at this time.

72. If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

Response:

Not Applicable.

73. If Company disagrees with BellSouth's bulk hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

Response:

Not Applicable.

74. Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

Response:

Not Applicable.

75. How many unbundled loops does Company contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

Response:

ALLTEL does not have an opinion on this issue at this time.

76. What is the appropriate information that you contend the Kentucky Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL does not have an opinion on this issue at this time.

77. What is the average completion interval metric for provision of high volumes of loops that you contend the Kentucky Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL does not have an opinion on this issue at this time.

78. What are the rates that you contend the Kentucky Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL does not have an opinion on this issue at this time.

79. What are the appropriate product market(s) that you contend the Kentucky Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

The product market should match the geographic area that coincides with the ability to obtain products and services such as switching services. Actual experience shows that carriers have the ability to provide switch functionality statewide from a single point within the state or in some cases, outside the state. AT&T Broadband, for instance, has only one switch in Kentucky to handle all of its switching needs statewide. (See DIRECT TESTIMONY OF DAVID J. SERED ON BEHALF OF AT&T BROADBAND PHONE OF KENTUCKY, LLC, May 7, 2003 in Kentucky Public Service Commission Case 2003-00023).

80. What are the appropriate geographic market(s) that you contend the Kentucky Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL has not yet finished exploring other possible market definitions which meet the FCC's and statutory criteria. Consequently ALLTEL reserves the right to propose definitions in the future.

81. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

Response:

No.

82. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

Response:

No.

83. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the Kentucky Public Service Commission should consider in establishing a “cutoff” consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

ALLTEL has not formulated an opinion on the subject of this Interrogatory at this time.

Respectfully submitted,

ALLTEL Kentucky, Inc
Kentucky ALLTEL, Inc.

By: Noelle M. Holladay
James H. Newberry, Jr.
Noelle M. Holladay
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Responses to BellSouth's Interrogatories were served on parties participating in electronic transmission by electronic mail, and that all other parties on the attached service list were notified by letter of the filing of this document, and were given an opportunity to receive a paper copy of this document by making a request to the undersigned attorney.

This 4th day of December, 2003.

Noelle M. Holladay
Noelle M. Holladay

EXHIBIT "A"
Response to Interrogatory No. 35
Churn by Customer Class

ALLTEL Kentucky, Inc.		
CHURN		
	Bus.	Res.
Dec-02	1.55%	1.36%
Jan-03	1.62%	1.67%
Feb-03	1.40%	1.48%
Mar-03	0.78%	1.70%
Apr-03	1.40%	1.87%
May-03	0.97%	2.20%
Jun-03	0.98%	2.03%
Jul-03	3.35%	2.09%
Aug-03	1.29%	2.12%
Sep-03	1.02%	2.19%
Oct-03	1.30%	2.13%

Kentucky ALLTEL. Inc.		
CHURN		
	Bus.	Res.
Dec-02	2.18%	3.58%
Jan-03	1.99%	3.08%
Feb-03	2.07%	2.67%
Mar-03	1.85%	3.09%
Apr-03	1.52%	3.13%
May-03	1.73%	3.52%
Jun-03	2.40%	3.46%
Jul-03	1.64%	3.60%
Aug-03	1.54%	3.36%
Sep-03	1.91%	3.29%
Oct-03	1.68%	3.37%

Exhibit B

Kentucky ALLTEL Inc.						
Central Office	CLLI	Street Address	City	Type	Host Switch	Staffing
ALBANY	ALBYKYXADS0	400 N. Washington	Albany	Stand Alone	Albany	unstaffed
ARLINGTON	ARTNKYXARS1	Hwy 80 & Arlington	Arlington	Remote	Bardwell	part time as required
ASHLAND	ASLDKYXADS0	619 15th Street	Ashland	Stand Alone	Ashland	full time
AUGUSTA	AGSTKYXARS0	306 Main St.	Augusta	Remote	Washington	
BARBOURVILLE	BBVLKYXARS0	207 S. Main St.	Barbourville	Remote	London	full time
BARDWELL	BRWLKYXADS1	Hwy 51 & Main St.	Bardwell	Host	Bardwell	part time as required
BEE SPRING	BESPKYXARS2	Hwy 259 & Hwy 728	Bee Spring	Remote	Smiths Grove	part time as required
BEREA	BEREKYXADS1	310 Center St.	Berea	Host	Berea	full time
BRADFORDSVILLE	BRVLKYXARS1	Central & Bradfordsville	Bradfordsville	Remote	Lebanon	unstaffed
BRODHEAD	BRHDKYXARS1	Sigman St. & Brodhead	Brodhead	Remote	London	unstaffed
BROOKSVILLE	BKVLKYXARS0	Madison St.	Brooksville	Remote	Washington	
BROWNSVILLE	BWVLKYXARS1	Washington St. & Reservoir	Brownsville	Remote	Smiths Grove	part time as required
BRYANTSVILLE	BTVLKYXARS0	Hwy 27 & Hwy 753	Bryantsville	Remote	Berea	unstaffed
BURKESVILLE	BSVLKYXARS0	109 Elm St.	Burkesville	Remote	Glasgow, KY	unstaffed
BURNSIDE	BRSDKYXADS0	E. French Ave.	Burnside	Stand Alone	Burnside	unstaffed
CALVERT CITY	CLCTKYXADS0	241 5th Ave.	Calvert City	Stand Alone	Calvert City	part time as required
CAMPBELLSVILLE	CMVLKYXADS0	302 Central Ave.	Campbellsville	Stand Alone	Campbellsville	full time
CANEYVILLE	CYVLKYXADS0	US Hwy 62 & St Hwy 185	Caneyville	Stand Alone	Caneyville	part time as required
CATLETTSBURG	CTBGKYXADS0	36th & Race St.	Catlettsburg	Stand Alone	Catlettsburg	
CECILIA	CECLKYXARS0	103 Cecil Ave.	Cecilia	Remote	Elizabethtown	unstaffed
CLARKSON	CKSNKYXADS0	414 S. Patterson	Clarkson	Stand Alone	Clarkson	part time as required
COLUMBIA	CLMAKYXADS0	118 E. Fortune St.	Columbia	Stand Alone	Columbia	unstaffed
COLUMBUS	CLMBKYXARS1	St. Hwy 80	Columbus	Remote	Bardwell	part time as required
CUMBERLAND, KY	CMLDKYXADS0	309 E. Main	Cumberland	Stand Alone	Cumberland, KY	full time
DOVER	DOVRKYXARS0	Johnson St.	Dover	Remote	Washington	
E.BERNSTADT	EBRNKYACRS0	Hwy 30 & E. Bernstadt	E. Bernstadt	Remote	London	unstaffed
ELIZABETHTOWN	EZTWKYXADS0	111 S. Main St.	Elizabethtown	Host	Elizabethtown	full time
EUBANK	EBNKKYXARS0	Hwy 70	Eubank	Remote	London	
EVARTS	EVRSKYXADS0	Hwy 38 & Evarts	Evarts	Stand Alone	Evarts	unstaffed
EWING	EWNGKYXARS0	Main St.	Ewing	Remote	Flemingsburg	
FAUBUSH	FBSHKYXARS0	Fabush Rd	Faubush	Remote	London	
FERNLEAF	FRNLKYXARS0	Hwy 10 & Hwy 43	Fernleaf	Remote	Washington	
FLAT LICK	FLLCKYXARS0	Stinking Creek Rd.	Flat Lick	Remote	London	unstaffed
FLEMINGSBURG	FMBGKYXADS0	220 E. Water St.	Flemingsburg	Remote	Flemingsburg	
GARRISON	GRSNKYXADS0	Kinney Rd & Garrison	Garrison	Stand Alone	Garrison	
GERMANTOWN	GMTWKYXARS0	Hwy 10 & Church St.	Germantown	Remote	Washington	
GLASGOW, KY	GLSGKYXADS0	301 W. Washington	Glasgow	Host	Glasgow, KY	full time
GRAYSON	GYSNKYXADS0	W. 2nd St.	Grayson	Stand Alone	Grayson	
GREENSBURG	GNBGKYXBDS0	112 S. Main St.	Greensburg	Stand Alone	Greensburg	unstaffed
GREENUP	GNUPKYXADS0	304 Laurel St.	Greenup	Host	Greenup	
HAZARD	HZRDKYXADS0	131 Memorial Dr.	Hazard	Host	Hazard	full time
HILLSBORO	HLBOKYXARS0	St. Hwy. 111	Hillsboro	Remote	Flemingsburg	
HODGENVILLE	HGVLKYXADS0	112 S. Water St.	Hodgensville	Stand Alone	Hodgensville	unstaffed
HUSTONVILLE	HTVLKYXEDS0	St. Hwy 78E	Hustonville	Remote	Liberty	unstaffed

IRVINE	IRVNKYXADS0	236 Broadway St.	Irvine	Stand Alone	Irvine	full time
Kentucky ALLTEL Inc.						
Central Office	CLLI	Street Address	City	Type	Host Switch	Staffing
JENKINS	JNKNKYXADS0	Main St.	Jenkins	Stand Alone	Jenkins	unstaffed
JOHNSVILLE	JHVLKYXARS0	Foster Rd. & Bradford Rd.	Johnsville	Remote	Washington	
LANCASTER	LNCSKYXADS0	108 Richmond St.	Lancaster	Stand Alone	Lancaster	full time
LEATHERWOOD	LTWDKYXARD0	St. Hwy 699	Leatherwood	Remote	Hazard	unstaffed
LEBANON	LBNNKYXADS0	E. Main	Lebanon	Host	Lebanon	unstaffed
LEITCHFIELD	LTFDKYXADS0	102 Mulberry St.	Leitchfield	Stand Alone	Leitchfield	unstaffed
LEWISBURG	LWGMKYXARS0	St. Hwy. 11	Lewisburg	Remote	Washington	
LEX ELKHORN	LXTNKYXFDS0	Higbee Mill Rd.	Lexington	Stand Alone	Elkhorn	full time
LEX LAKESIDE	LXTNKYXGDS0	3475 Dabney Dr.	Lexington	Stand Alone	Lakeside	full time
LEXINGTON EAST	LXTNKYXBDS0	335 Duke Rd.	Lexington	Stand Alone	Lexington East	full time
LEXINGTON MAIN	LXTNKYXADS1	151 S. MLK Blvd.	Lexington	Stand Alone	Lexington Main	full time
LEXINGTON NORTH	LXTNKYXEDS0	1832 Bryan Station Rd.	Lexington	Stand Alone	Lexington North	full time
LEXINGTON SE	LXTNKYXCDS0	679 Wilson Downing Rd.	Lexington	Stand Alone	Lexington SE	full time
LEXINGTON SOUTH	LXTNKYXDDS0	124 N. Pin Oak Dr.	Lexington	Stand Alone	Lexington South	full time
LEXINGTON UNIV	LXTNKYUKDS0	538 Rose St.	Lexington	Stand Alone	Lexington Univ.	full time
LIBERTY	LBRTKYXADS1	Hutsonville St.	Liberty	Host	Liberty	full time
LIVINGSTON	LVTNKYXARS1	Main St	Livingston	Remote	London	unstaffed
LONDON	LONDKYXADS0	719 N. Main	London	Host	London	full time
LORETTO	LRTTKYXARS0	St. Hwy 49	Loretto	Remote	Lebanon	unstaffed
MAMMOTH CAVE	MMCVKYXARS1	Mammoth Cave Ent. Rd	Mammoth Cave	Remote	Smiths Grove	part time as required
MANCHESTER	MNCHKYXARS0	211 main St.	Manchester	Remote	London	full time
MAYS LICK	MYLCKYXARS0	Old US 68	Mays Lick	Remote	Washington	
MEADS	MEDSKYXADS0	Hwy. 60	Meads	Stand Alone	Meads	
MIDWAY, KY	MDWYKYXARS0	124 E. Stevens St.	Midway	Remote	Versailles	unstaffed
MILBURN	MLBNKYXARS1	Hwy. 80	Milburn	Remote	Bardwell	part time as required
MONTICELLO	MNTIKYXADS0	Huffaker St.	Monticello	Stand Alone	Monticello	full time
MOREHEAD	MRHDKYXADS0	154 E. 2nd St.	Morehead	Stand Alone	Morehead	full time
MT. OLIVET	MTOLKYXARS0	Walnut St.	Mt. Olivet	Remote	Washington	full time
MT. VERNON	MTVRKYAIRS0	W. Main St.	Mt. Vernon	Remote	London	unstaffed
NANCY	NANCKYXARS0	St. Hwy. 80	Nancy	Remote	Somerset	unstaffed
NICHOLASVILLE	NCVLKYXADS0	103 N. York St.	Nicholasville	Host	Nicholasville	full time
OLIVE HILL	OLHLKYXADS0	Mill Branch St.	Olive Hill	Stand Alone	Olive Hill	
ONEIDA	ONEDKYXARS0	1st St.	Oneida	Remote	London	
OWINGSVILLE	OWVLKYXADS0	Treadway Dr.	Owingsville	Host	Owingsville	
PAINT LICK	PNLCKYXERS1	St. Hwy. 52	Paint Lick	Remote	Berea	unstaffed
PARK CITY	PRCYKYXARS1	US Hwy. 31	Park City	Remote	Smiths Grove	part time as required
RUSSELL, KY	RSSLKYXBDS0	Flatwoods	Russell	Stand Alone	Russell, KY	
SALT LICK	SLCKKYXARS0	Hwy. 60 & Hwy211	Salt Lick	Remote	Owingsville	
SCIENCE HILL	SCHLKYARS0	Stanford St.	Science Hill	Remote	London	
SCOTTSVILLE	SCVLKYXARS0	201 E. Locust St.	Scottsville	Remote	Glasgow, KY	unstaffed
SHARPSBURG	SHBGKYXARS1	Mill St.	Sharpsburg	Remote	Owingsville	
SHOPVILLE	SOVLKYXARS0	Hwy. 80	Shopville	Remote	London	
SMITHLAND	SMLDKYXADS0	Hwy 60	Smithland	Stand Alone	Smithland	part time as required
SMITHS GROVE	SMGVKYXADS1	Hwy 101	Smiths Grove	Host	Smiths Grove	part time as required
SO. HARDIN	SHDNKYXARS1	Main St.	So. Hardin	Remote	Elizabethtown	unstaffed

SOMERSET	SMRTKYXADS0	305 N. Maple St.	Somerset	Host	Somerset	full time
Kentucky ALLTEL Inc.						
Central Office	CLLI	Street Address	City	Type	Host Switch	Staffing
SOUTHSHORE	SSHRKYXARS0	813 Clark Ave.	Southshore	Remote	Greenup	
TOLLESBORO	TLBOKYXADS0	Hwy. 57 & Hwy. 10	Tollesboro	Stand Alone	Tollesboro	
TOMPKINSVILLE	TMVLKYXARS0	404 W. 4th St.	Tompkinsville	Remote	Glasgow, KY	unstaffed
UNIONTOWN	UNTWKYXADS0	501 2nd St.	Uniontown	Stand Alone	Uniontown	part time as required
VANCEBURG	VNBGKYXARS0	Flinders Ln	Vanceburg	Stand Alone	Vanceburg	
VERSAILLES	VRSLKYXADS0	137 N. Main St.	Versailles	Host	Versailles	full time
VICCO	VICCKYXARL0	Stacy Branch & Main St.	Vicco	Remote	Hazard	unstaffed
WASHINGTON	WASHKYXADS0	1935 Hwy. 68	Washington	Host	Washington	
WHITE LILY	WHLLKYXARS0	Hwy. 192	White Lily	Remote	London	
WILMORE	WLMRKYXARS0	S. Lexington Ave.	Wilmore	Remote	Nicolasville	unstaffed

ALLTEL Kentucky, Inc.						
Central Office	CLLI	Street Address	City	Stand Alone Remote	Host Switch	Staffing
MT. WASHINGTON	MTWSKYXADS0	100 East Street	MT. Washington	Remote	Zoneton	full time
SHEPHERDSVILLE	SHPVKYXADS0	141 S. Buckman Street	Shepherdsville	Remote	Zoneton	full time
ZONETON	ZNTNKYXADS0	Windy Hills Road	Zoneton	Host	Zoneton	full time